



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

October 14, 2022

BY ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Application GRANTED.
SO ORDERED.
Dated: 10/17/2022

P. Kevin Castel
United States District Judge

Re: *United States v. Wynder and Brown*, 20 Cr. 470 (PKC)

Dear Judge Castel:

The Government respectfully writes in connection with the Court's August 19, 2022 Opinion (Dkt. 148) directing the Office to update the Court regarding the steps we are taking to review the causes of the inadvertent discovery errors in this case and to implement ameliorative measures to reduce the risk of recurrence in other cases. (*Id.* at 9). That update is due today. I have been out of the Office sick for the past two days, and while focused on the update, respectfully ask permission to submit the update Monday, October 17, so that I can better ensure that the letter responds in a fully considered manner. I apologize for any inconvenience and the late hour of this filing. Counsel for both defendants consent to this request.

Respectfully submitted,

/s/

Daniel M. Gitner
Chief, Criminal Division
212-637-2232

Cc: Counsel for all defendants (by ECF)